

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SUPPRESSED FILED

MAR 27 2024

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILBERT CLARK,

Defendant.

4:24CR139 HEA/SPM

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about January 30, 2024, in the City of St. Louis, within the Eastern District of Missouri,

**WILBERT CLARK,**

the Defendant herein, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, knowingly possessed one or more firearms, and the firearms previously traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section(s) 922(g) as set forth above, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation(s).

2. If any of the property described above, as a result of any act or omission of the

defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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J. CHRISTIAN GOEKE, #39462(MO)  
Assistant United States Attorney